

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SIGNIFY NORTH AMERICA CORPORATION  
and  
SIGNIFY HOLDING B.V.

Plaintiffs,

vs.

REGGIANI LIGHTING USA, INC.  
and  
REGGIANI S.P.A. ILLUMINAZIONE

Defendants.

Civil Action No. 1:18-cv-11098-ER

**JURY TRIAL DEMANDED**

**SIGNIFY NORTH AMERICA CORPORATION  
AND SIGNIFY HOLDING B.V.’S ANSWER TO  
DEFENDANTS’ FIRST AND SECOND COUNTERCLAIMS**

Plaintiffs Signify North America Corporation and Signify Holding B.V. (collectively, “Signify”) responds to and answers the First and Second Counterclaims of Reggiani Lighting USA, Inc. and Reggiani S.p.A. Illuminazione (“Defendants”) as follows:

**PARTIES**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.

**JURISDICTION AND VENUE**

5. Admitted.
6. Admitted.

7. Admitted.

**BACKGROUND**

8. Signify is without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 8, and on that basis, denies them.

9. Signify is without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 9, and on that basis, denies them.

10. Signify is without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 10, and on that basis, denies them.

11. Signify is without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 11, and on that basis, denies them.

**COUNTERCLAIM ONE**  
**(Declaration of Alleged Invalidity)**

12. To the extent this paragraph requires a response, denied.

13. Admitted that an actual justiciable controversy exists between Signify and Defendants regarding the validity of the asserted claims of the Patents-in-Suit, and that controversy is ripe for adjudication by this Court, but denies that Defendants state any valid basis thereunder.

14. Admitted.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

**COUNTERCLAIM TWO**  
**(Declaration of Alleged Noninfringement)**

22. To the extent this paragraph requires a response, denied.

23. Admitted.

24. Denied.

25. Denied.

26. Denied.

27. Denied.

28. Denied.

29. Admitted that an actual justiciable controversy exists between Signify and Defendants regarding the infringement of the asserted claims of the Patents-in-Suit, and that controversy is ripe for adjudication by this Court, but denies that Defendants state any valid basis thereunder.

30. Denied.

**COUNTERCLAIM THREE**  
**(Declaration of Alleged Patent Misuse)**

Pursuant to Federal Rule 12(b)(6), Signify is seeking to file a motion to dismiss Defendants' Third Counterclaim. Signify explicitly reserves the right to answer the allegations to this Counterclaim pending determination of the motion and/or further order of this Court.

**PRAYER FOR RELIEF**

These paragraphs set forth the statement of relief requested by Defendants to which no response is required. Signify denies that Defendants is entitled to any of the requested relief and denies any allegations contained to which a response is required.

Dated: April 12, 2019

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

s/ Jeremy P. Occek

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***COUNSEL FOR PLAINTIFFS***  
***Signify North America Corporation and***  
***Signify Holding B.V.***

**CERTIFICATE OF SERVICE**

I hereby certify that on April 12, 2019, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which would then electronically notify all registered CM/ECF participants in this case.

Dated: April 12, 2019

s/ Jeremy P. Occek  
Jeremy P. Occek

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